

Statement for the examination of the Cranbrook DPD

Response to the Inspectors Matters Issues and
Questions

Matter 5: Treasbeare Expansion Area

Date – 8 January 2020

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Issue 8: Is the Treasbeare Allocation (Policy CB3) positively prepared, justified and effective?

Response	Inspectors Question(s)
<p>1.1 Is the proposed housing allocation deliverable and/or developable in accordance with the housing trajectory? In particular, is it: a) confirmed by the landowner involved as being available for the use proposed? b) supported by evidence to demonstrate that safe and appropriate access for vehicles and pedestrians can be provided? c) deliverable, having regard to the provision of the necessary infrastructure and services, and any environmental or other constraints?</p>	<p>Q57 - Deliverability of allocation with regard to land ownership, access and constraints</p>
<p>1.2 The housing allocation comprising Treasbeare is under a single ownership. The land owner and their agent have been actively involved in the promotion of the site for development and have attended various meetings with the Local Planning Authority. The development area remains available.</p>	
<p>1.3 In addition and with reference to post submission documents (PSD2),¹ there are three applications for outline permission that have previously been submitted and which further evidence the interest in delivering the site by developers. While it is understood that the original developer is</p>	

¹ <https://eastdevon.gov.uk/media/3454581/psd2-planning-application-summary-november-2019.pdf>

no longer engaged with the site, there has been meaningful engagement with an alternative prospective development which continues to give confidence that the site remains developable.

- 1.4 The previous applications and the Cranbrook Masterplan Movement Strategy ([Cran026](#)²), together with its addendum ([Cran065](#)³) have shown the principle of the movements expected, and that together with a new roundabout facilitates a safe access into the site. Previous suggestions have been made about a potential pedestrian bridge linking Treasbeare and Bluehayes and land on both sides on the London Road have been identified together with a capital costs contribution towards the delivery of such a bridge within the [Cranbrook IDP](#)⁴ and the update set out as appendix 1 to the statement on Matter 9. Work is continuing however to understand the need for such a bridge and whether desire lines can be established which allow safe crossing points for pedestrians which are at grade. Such points are inherently better used if they can be provided in this form.

- 1.5 Delivery of development at Treasbeare has two key constraints – comprising the noise impact associated with the airport engine testing and the landscape impact associated with the ridge that forms the eastern edge of the expansion area.

- 1.6 Evidence set out in the following two documents demonstrate that with careful layout and phasing of development both can be overcome so that they do not present an insurmountable constraint to development

² <https://eastdevon.gov.uk/media/2262530/cranbrook-masterplan-movement-strategy-rev-d.pdf>

³ https://eastdevon.gov.uk/media/3264903/cran065-190801_transport-and-movement-addendum.pdf

⁴ <https://eastdevon.gov.uk/media/2761724/cranbrook-infrastructure-delivery-plan.pdf>

<p>Cran 015 - https://eastdevon.gov.uk/media/2260194/EDDC-DM-and-EH-Joint-Airport-Noise-Study.pdf</p> <p>Cran051 https://eastdevon.gov.uk/media/2760821/Landscape-and-Visual-Appraisal-of-Revised-Proposals.pdf</p> <p>1.7 Other environmental considerations have been addressed through the plan, policy and in developing the masterplan such that development on the Treasbeare site is deliverable.</p>	
<p>1.8 Has full consideration been given to the impact of this allocation on:</p> <p>a) Access arrangements</p> <p>b) Landscape impact</p> <p>c) The relationship with the airport including the flight path and the engine testing facility in respect of noise?</p> <p>1.9 Access to the allocation is good with three key access points into the site – two from the London Road and one from Parsons Lane. In addition the potential to get good pedestrian access into the site down Treasbeare Lane also exists. Connection with and linkages between Cranbrook phase 1 and the expansion areas is important and should be able to be achieved in this instance.</p> <p>1.10 In terms of landscape impact great care has been given to the eastern extent of the built form recognising the landscape evidence that underpins the allocation and is referenced in evidence documents particularly Cran051⁵ but also having regard to Cran032; 043; 046; 047</p>	<p>Q58 –</p> <p>Consideration in respect of access, landscape, amenity and the airport</p>

⁵ <https://eastdevon.gov.uk/media/2760821/landscape-and-visual-appraisal-of-revised-proposals.pdf>

collectively found on the [examination⁶web page](#). It has been in giving full regard to this evidence that the built up area boundary for development area has been located to the west of the sensitive ridge and that less intrusive sports pitch development has been located to the east. Where these are provided on the higher level pitches it is not envisaged that these are flood lit and as such this development would not result in significant harm to the wider environment.

- 1.11 The relationship with the airport including the flight path and the engine testing facility in respect of noise has also played a significant part in the policies that the Cranbrook Plan proposes as it is considered important to not only maintain the health and well-being of future occupiers of this development area but also to safeguard the legitimate operation of a successful airport that is valuable to the local economy.
- 1.12 Since the Cranbrook Plan was submitted, it is possible to confirm that the Instrument Landing System at Exeter Airport is in the process of being upgraded and therefore is no longer a direct constraint to development. The Local Planning Authority is aware however of the potential need to undertake an Instrument Flight Procedure safeguarding assessment which is likely to be required as a result of an updated CAA publication - CAP 738 which is currently in preparation. A new combined Obstacle Limitation Surface and IFP Safeguarding map which will inform the assessment is due to be released during January 2020.
- 1.13 Noise is an inherent component of an airport and careful assessment has been under and is set out in evidence document [Cran 015⁷](#).

⁶ <https://eastdevon.gov.uk/planning/planning-policy/cranbrook-plan/cranbrook-plan-consultation-responses-and-submission/#article-content>

⁷ <https://eastdevon.gov.uk/media/2260194/eddc-dm-and-eh-joint-airport-noise-study.pdf>

<p>Importantly this recognises the impacts of the engine testing facility which is located at Exeter Airport. Through assessment it is concluded that provided the area of testing is enclosed with a pen and individual properties within identified zones are laid out and provided with on plot mitigation, development should not pose a constraint to the operations (including engine testing) at the airport. This need is recognised within Policy CB3 of the Cranbrook Plan.</p>	
<p>1.14 What is the justification for development on land identified as green wedge within Strategy 8 of the adopted Local Plan?</p> <p>1.15 Strategy 8 of the adopted Local Plan states that: Within Green Wedges, as defined on the Proposal Map, development will not be permitted if it would add to existing sporadic or isolated development or damage the individual identity of a settlement or could lead to or encourage settlement coalescence.</p> <p>1.16 The supporting text to the policy also clarifies the intention of the policy by stating:</p> <p>1.17 “One of the potential results of ‘creeping’ development could be the coalescence of adjacent or neighbouring settlements, villages or towns. To prevent such coalescence it is important that open land between settlements is retained thus helping them maintain their separate identities, their landscape settings and to avoid the creation of unrelieved development “</p> <p>1.18 As such the clear intention of the policy is to prevent settlement coalescence rather than prohibit all development. In addition the</p>	<p>Q59 – Justification for development on the green wedge</p>

<p>Framework requires that a sufficient amount and variety of land is brought forward where it is needed.</p>	
<p>1.19 In this instance the land which is located within the Green Wedge and lies within Clyst Honiton Parish is only included following detailed landscape assessment. The two fields identified – one for housing and one for a gypsy and traveller site are on largely north and north east facing slopes that contain much of the development within the associated valley. Development of this area would therefore be read in the context of Cranbrook rather than the surrounding countryside. In addition the topography, layout and separation distance ensure that development of these two fields do not result in settlement coalescence or harm the identity of Rockbeare.</p>	
<p>1.20 Strategy 7 of the East Devon Local Plan rules against development that would cause the adverse disruption of a view from a public place which forms part of the distinctive character of the area or otherwise causes significant visual intrusions. Would the allocation of CB3 result in the loss of open space and lead to settlement coalescence; would it conflict with the EDLP in respect of strategy 7 by proposing development which would impact on the skyline (the ridge)?</p>	<p>Q60 – Impact of development on public views and open space</p>
<p>1.21 Development of the allocation of CB3 is not considered to run contrary to Strategy 7 of the Local Plan which was never envisaged to inform the identification of specific strategic allocations. The Policy is premised on the need to restrict development in the countryside which lies outside of Built Up Area Boundaries and allocations. In the case of Cranbrook the adopted Local Plan made only two allocations in addition to Cranbrook Phase 1 (which are east and west of Cranbrook</p>	

phase 1) while identifying an area of search for a further 1550 units of accommodation. The proposed Treasbeare allocation lies within the area of search and therefore complies with Strategy 12 of the Local Plan.

1.22 In forming the proposed allocation significant regard was given to landscape assessments submitted as Cran032 and Cran051 and collectively found on the [examination web page](#)⁸ to ensure that the minimum impact would result. It is for this reason that the proposed development has been kept away from the easternmost ridge within the allocation. Development associated with the allocation would not result in loss of open space – currently the land is private agricultural land only, and while localised visual impacts will undoubtedly occur these have been minimised to ensure that there would not be wider landscape impacts outside of the effective envelope around this part of the Town. It is noted that suggestions were made at the last consultation stage which proposed the swapping of sports pitches with additional housing land. Unfortunately it is not considered that the topography would support such a change (resulting in pitches being located on significantly sloping ground). In addition it is not considered that there is sufficient land to accommodate the proposed switch.

1.23 **What is the justification for the scale of the neighbourhood centre proposed?**

1.24 The indicated area and scale of the neighbourhood centre at Treasbeare is justified.

**Q61 –
Justification for
scale of
neighbourhood
centre**

⁸ <https://eastdevon.gov.uk/planning/planning-policy/cranbrook-plan/cranbrook-plan-consultation-responses-and-submission/#article-content>

- 1.25 The [Cranbrook Economic Development Strategy](#)⁹ (CEDS) requires 37,800m² floor space for town centre uses across Cranbrook. Of this, policy CB3 requires a minimum of 1500m² in floor space compatible with neighbourhood uses at Treasbeare.

- 1.26 The masterplan indicates a neighbourhood centre area of 1.32 hectares; greater than required to deliver this floor area. Additional community uses are identified along with other business uses that make up much of the additional area. However, the masterplan is designed to enable flexibility in the medium and long term, as other uses will be identified by the community living and working at Cranbrook which cannot at present be known or predicted. This flexibility is important to the ability of the community to have future autonomy, maintain good health and wellbeing, cohesion and identity as noted by the previous generation of new towns.

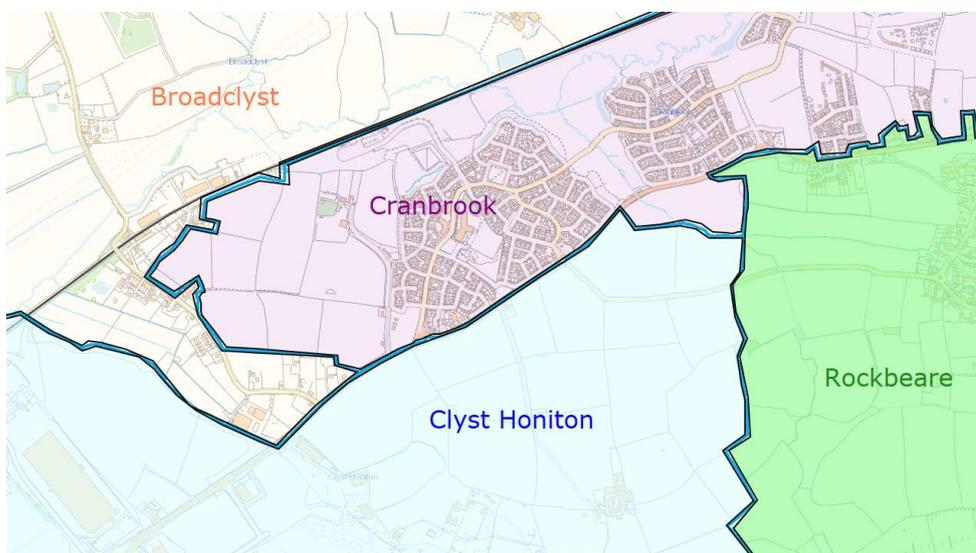
- 1.27 Residential development can be included within the neighbourhood centre area as part of a mixed-use development design, though purely residential development would be resisted until such time as it can be proved that community needs have been satisfied with relevant neighbourhood centre facilities.

1.28 **What is the justification for inclusion of land within Rockbeare Parish in the Treasbeare allocation?**

**Q62 –
Justification for
inclusion of land
within
Rockbeare**

⁹ <https://eastdevon.gov.uk/media/2260179/cranbrook-economic-development-strategy.pdf>

1.29 In respect of the Treasbeare allocation there is no encroachment into the Rockbeare Parish. This is shown in the map extract set out below which highlights the four Parish areas and their respective boundaries.



1.30 **What is the Visual impact of the playing fields at Treasbeare on the green wedge and on the proposed SANG?**

1.31 Visual Impact of the playing fields on the wider countryside was informed through detailed assessment set out within documents Cran032 – 051 collectively found on the [examination ¹⁰web page](#).

1.32 Specifically these evidence documents recognise the topography of the area and the presence of a local ridge detailing the sensitivity of the landscape to either side of the ridge. In having regard to this information the Council consider that the top fields (those located along

Q63 – visual impact of playing field on the Green wedge

¹⁰ <https://eastdevon.gov.uk/planning/planning-policy/cranbrook-plan/cranbrook-plan-consultation-responses-and-submission/#article-content>

the highest part of the ridge) are very gently sloping and as such are more suitable for sports pitch provision than many other areas of Treasbeare which otherwise presents more steeply sloping topography. Such areas would need far greater engineering operations to adequately provide for the necessary sport pitch provision with the resulting reprofiling appearing engineered and unnatural which would undermine the character of the area.

1.33 In terms of the impact on the green wedge and proposed SANG the master plan demonstrates how the all-weather pitch and flood lit tennis courts could be located on the westward facing slopes of the area and set sufficiently below the ridge to ensure that significant impacts on the green wedge are limited. While goal posts and nets would appear on the top of the ridge, these are narrow light weight structures which are typically white. Viewed from the lower ground of the green wedge these would be seen against the backdrop of the sky with little impact - further supported by the reduced engineering that would be needed to facilitate the pitch creation.

1.34 In terms of the impact on SANG the pitches have been kept back from the edge of the area of open space where this joins with proposed SANG. This buffer is considered sufficient to prevent an urbanising effect on the SANG is not a matter which is in disagreement between the Local Authority and Natural England.

1.35 **Does the Masterplan represent the only strategy for the development of this site? Would it be appropriate?**

1.36 The masterplan identified in Cran052 is not the only way of laying out development of the Treasbeare area. However it is a detailed and well

Q64 – status of the masterplan as strategy for Treasbeare

<p>considered layout that makes efficient use of land, maximising the housing delivery in an area that has challenging topography and noise constraints from the airport. As such the masterplan is considered an appropriate way of delivering development within the Treasbeare area and any deviation from the Masterplan would need to be robustly evidenced.</p>	
<p>1.37 Is the siting of a 5 pitch Gypsy and Traveller site at the eastern extent of Treasbeare appropriate?</p> <p>1.38 The siting of a 5 pitch Traveller site at the eastern extent of Treasbeare is appropriate. It recognises the strong cultural identity of many Travellers and the strong desire from Romany Gypsies to live closely together. The Treasbeare site would be suitable for an extended family group, or several family pitches. The importance of family ties was stressed by many Gypsy respondents to the Cranbrook Plan preferred approach consultation¹¹ and several asked if extended family groups could move together (requiring 3-4 pitches) so that they could continue to offer health care and social support and have room for pitch expansion to accommodate future family needs. In consultation, family proximity was often cited as more important than facilities, condition of accommodation or crowding and the Cranbrook Plan seeks to respect and accommodate this.</p> <p>1.39 Due to frequent travelling by economically active family members, especially during the summer, the Treasbeare site could be laid out for minimal maintenance and is in close proximity to schools and services</p>	<p>Q65 – Siting of Gypsy and Traveller Pitches</p>

¹¹ <https://eastdevon.gov.uk/planning-libraries/cranbrook-plan-pa-2017-18/eddcsummarygypsyandtravellerresponses.pdf>

<p>which would be used daily by those unable to travel e.g. children and their care-givers.</p>	
<p>1.40 A site of 5 pitches is allocated to ensure that the overall balance of housing types and tenures in the area is maintained and to reduce the concerns expressed by some of the settled population that very large family groups are less likely to integrate into the local community and may impact upon social cohesion. A 5 pitch site could make best use of the topography of the site and more readily integrate into the surrounding landscape than a larger number of pitches. Other similarly accessible locations within the Treasbeare area would not be suitable for the siting of caravans due to noise from the airport operations.</p>	
<p>1.41 Does reference to A5 Use Class premises accord with national policy in para 91c of the Framework? [applies also to CB4 and CB5]</p>	<p>Q66 – A5 use restriction and National Policy</p>
<p>1.42 The Council consider that the inclusion of A5 use class premises would not undermine national policy as set out in para 91c of the National Planning Policy Framework and therefore accords with the policy framework for supporting healthy lifestyles.</p>	
<p>1.43 As well as providing much needed housing to meet the growing need of the population, The Cranbrook Plan looks to embed within it the principles of designing good health and well-being outcomes into the town and encouraging people to lead active lifestyles.</p>	
<p>1.44 To enable and support healthy lifestyles, especially where this would address identified local health and well-being needs, the plan seeks to provide accessible infrastructure to include facilities, local shops and as</p>	

part of this access to healthier food. This is not to exclude A5 (Hot food takeaway) uses completely but to provide a focus towards good health and well-being related food outlets in the town that will support residents in making balanced and healthier choices.

1.45 The Government commissioned [Foresight Report](#)¹² of 2007 which examined the reasons for the rising and significant levels of obesity, concluded that there were a ‘complex web’ of factors involved ranging from unhealthy diets, low levels of physical activity as well as subtler causes such as societal influences and environmental factors which can make it difficult to make healthy choices.

1.46 Recognising the relationship between the health impacts, nutrition and hot food takeaways, evidence suggests that the presence of hot food takeaways in high numbers has a relationship with increased levels of excess weight and obesity. The proposed policy approach therefore seeks to limit the amount of A5 uses to 1 unit of A5 use class for every 3 units of other A use classes within the neighbourhood centres. This will be a cumulative calculation, taking into account any existing premises. It is considered that this approach would not lead to an over concentration of A5 uses within any one individual centre.

1.47 **Has full consideration been given to the impact of this development on air quality and its’ proximity to the airport?**

1.48 Consideration has been given to air quality as part of the focus of the Cranbrook Plan on Health and well-being. With this being an important objective, regard has been given to the work undertaken by the

**Q67 –
Consideration of
air quality and
proximity to the
airport**

¹² <https://www.gov.uk/government/publications/reducing-obesity-future-choices>

Environmental Health team at East Devon and their annually published Air Quality Annual Statement Report – most recently published in [October 2019](#)¹³.

- 1.49 This recognises that the main pollutant of concern in East Devon is NO₂ arising from road traffic around the busier and more congested areas and as such East Devon District Council (EDDC) have continued to primarily focus on NO₂ monitoring and management with fifty four passive monitoring sites monitoring NO₂ concentrations across East Devon including a number on the southern edge of Cranbrook.
- 1.50 The conclusion of this monitoring recognises that air quality across East Devon District Council is of a high overall standard and that there are no designated Air Quality management areas identified.
- 1.51 In addition Environmental Health have also reviewed information that was submitted by the applicant for the 2017 application for the Treasbeare development (17/1842/MOUT - please refer to submission [PSD2](#)¹⁴).
- 1.52 The Environmental Statement assessed several data sources. It recognised how background concentrations within the Cranbrook area are influenced by both Exeter Airport and the B3174 corridor and considered that both of these influences are predicted to get worse over the next 20 years. As part of the submission modelling was undertaken which considered the future predictions, adjusting the modelled results upwards by 21% to reflect the fact that measured results in this area are actually 21% higher than the modelled results.

¹³ <https://eastdevon.gov.uk/environmental-health-and-wellbeing/land-air-and-water-pollution/air-quality/review-monitoring-and-assessment-reports/2019-to-2020-8th-round/>

¹⁴ <https://eastdevon.gov.uk/planning/planning-policy/cranbrook-plan/cranbrook-plan-examination/#article-content>

- 1.53 Reference was also given to DEFRA predictions of a gradual improvement in air quality with improved technology, but as this is theoretical and does not appear to take into account the significant increase in traffic movements which are inevitable in this area within the next 20 years, such an approach was cautioned.
- 1.54 Concluding the assessment it was predicted that annual traffic pollution levels would maintain levels below the national objective of 40 micrograms per cubic metre, and, as such that the impact of the development with regards exposure to air quality is negligible.
- 1.55 Some concern has been expressed about the Fire Service training area located at the airport which is in regular use throughout the week. The usual pattern of smoke dispersal adds further weight to the restriction of housing from the southern area of the Treasbeare allocation
- 1.56 In terms of odour emissions, a survey was carried out by the developers in 2016 in relation to application 15/0046/MOUT. It is recognised that the survey was limited in scope and results, but did show that the potential odour sources (notable aviation fuel from the airport) were considered and, although clearly present at times, not regarded as prohibitive to development. Whilst it can be difficult to quantify the occurrence, strength and source of odour, the presence of general odour detected was neither considered continuous nor severe in strength. Speciated VOC monitoring recorded concentrations below detectable thresholds.

<p>1.57 In considering this response, regard is also given to the document Cran011 Health Impact Assessment¹⁵.</p>	
<p>1.58 Is the employment allocation at Treasbeare justified? What is the rationale for the extent and location of this allocated land?</p> <p>1.59 The Cranbrook Economic Development Strategy (CEDS) requires a total land area of 18.4 hectares for economic development at Cranbrook including 8.7 hectares of ‘B’ class uses to fulfil a role as a local centre supporting jobs and enterprise and best support its community and be compatible with neighbouring economic areas, including Exeter.</p> <p>1.60 The area indicated for ‘B’ class uses in Treasbeare totals 4.7 hectares. It has been located here to benefit from:</p> <ul style="list-style-type: none"> • proximity to the Sky Park employment site; • neighbourhood centre at Treasbeare which it will also help support; • proximity to the connection to Broadclyst via the Station Road; • proximity to the existing railway station and London Road. <p>1.61 The remainder of the employment space will be delivered within the neighbourhood centres and town centre, and the mixed use area indicated in Bluehayes.</p>	<p>Q68 – justification for employment allocation</p>

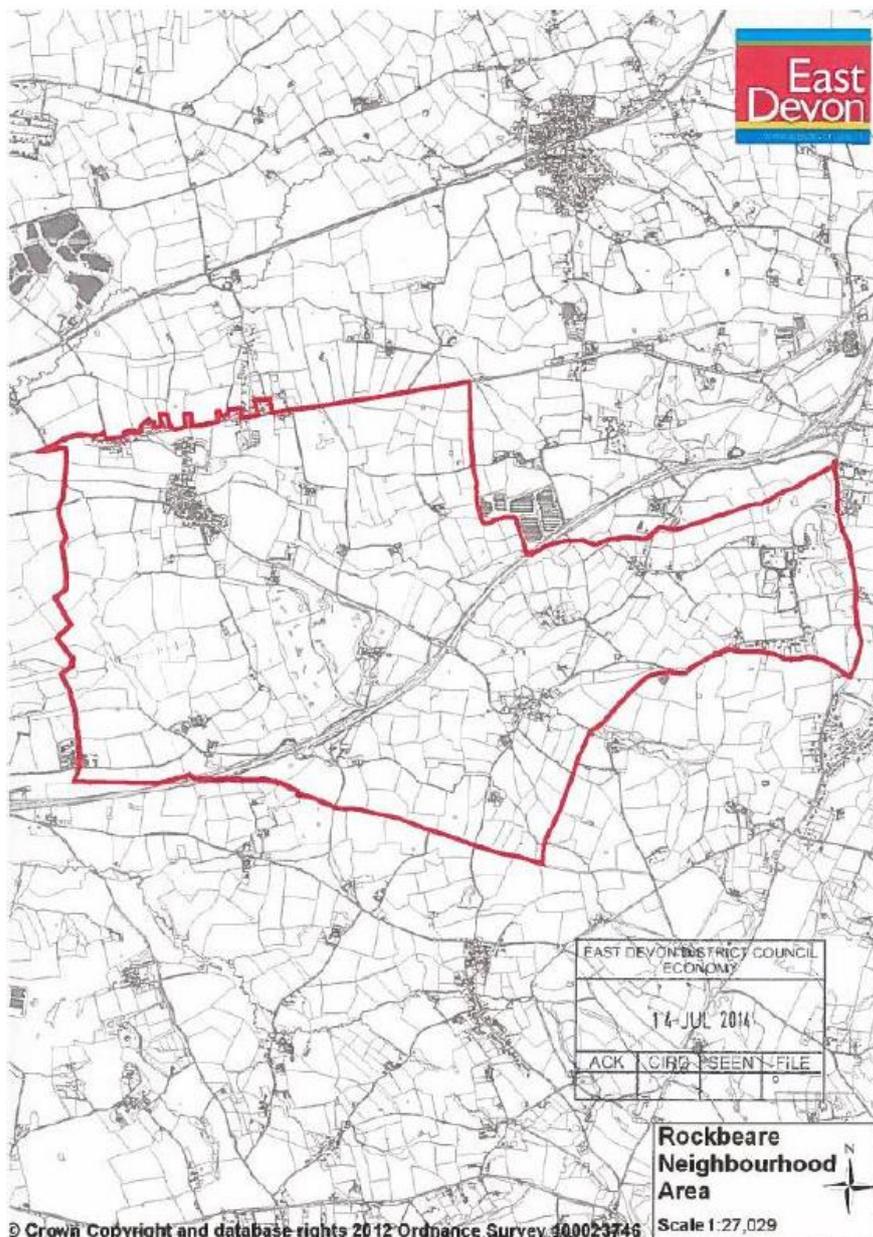
¹⁵ <https://eastdevon.gov.uk/media/2760791/Health-Impact-Assessment.pdf>

<p>1.62 Should Suitable Alternative Green space provision (SANG) only be brought forward in accordance with the needs of a specific development and not to address failure to deliver elsewhere?</p> <p>1.63 The delivery of land by a developer for SANGS purposes represents a planning obligation which like all other obligations must meet three well defined tests:</p> <p>(a) necessary to make the development acceptable in planning terms;</p> <p>(b) directly related to the development; and</p> <p>(c) fairly and reasonably related in scale and kind to the development</p> <p>1.64 As such only the necessary quantum of SANGS can be required from any particular development – i.e. that which accords with the calculation which is clearly set out within Policy CB15 comprising 8 ha of land per 1000 population based on a typical occupancy of 2.35 people per dwelling.</p> <p>1.65 However this obligation doesn't prevent a commercial transaction taking place between a land owner and either another developer or the Local Planning Authority in purchasing land for SANGS purposes. Such a transaction would sit outside of a Section 106 agreement and would not affect the acceptability of any planning permission being sought.</p> <p>1.66 Further explanation and discussion around SANGS matters are dealt with in Matter 16, Issue 25, questions 194 – 202 inclusive.</p>	<p>Q69 – SANG provision</p>

1.67 **Do the provisions of the allocation accord with the Rockbeare Neighbourhood Plan?**

1.68 The Rockbeare Neighbourhood plan area accords with Parish Boundary, an extract for which is set out in response to Question 62. From this it will be noted that the allocation in Treasbeare does not encroach into the Rockbeare Parish or its Neighbourhood Plan area.

**Q70 –
Conformity
between
allocation and
Rockbeare NP**



<p>1.69 What consideration has been given to the provision of the local centre in respect of multiple land ownership and delivery issues?</p> <p>1.70 The Treasbeare allocation is provided on an area of land which is under single ownership. As such it is not envisaged that delivery of this Neighbourhood centre would present delivery issues arising from multiple ownership.</p>	<p>Q71 – Provision of local centre</p>
<p>1.71 How has the figure of around 915 dwellings for this allocation been arrived at? Is the allocation capable of accommodating a larger capacity of new housing?</p> <p>1.72 The housing figure for this expansion area has been arrived at through a masterplanning approach that was designed to find the best way of accommodating the housing number for Cranbrook while sustaining the settlement already being delivered to an existing planning permission (03/1900/MOUT). There were three primary considerations:</p> <ul style="list-style-type: none"> • Attain the housing figure for Cranbrook in a sustainable development pattern • Maintain the sustainability of the existing planning permission • Ensure the housing can be served by the existing and planned transport infrastructure. <p>1.73 The masterplan was designed around a network of routes that form the most sustainable links with those set within the existing planning permission and existing roads and settlements around Cranbrook.</p> <p>1.74 A development block pattern was set up by this network of routes and housing densities were allocated to those blocks to identify the housing</p>	<p>Q72 – Derivation for housing capacity</p>

<p>number for this expansion area. These densities are highest around the neighbourhood centre and along major routes through and past the expansion area.</p> <p>1.75 Although a higher housing density, and therefore housing number, is achievable, the densities in the existing planning permission are relatively low and homogenous in comparison to more established towns. To maintain the attractiveness of the town centre for footfall dependent uses, the densities in the expansion areas are kept lower than they might otherwise be so that their neighbourhood centres do not take away trade from the town centre by being better supported by high surrounding housing density.</p> <p>1.76 Housing numbers have also been kept to the figures required in the East Devon Local Plan as these have been tested against the capacity of the wider highways network around Cranbrook.</p>	
<p>1.77 What is the purpose of a Comprehensive Development Scheme in relation to this allocation?</p> <p>1.78 The Comprehensive Development Scheme (CDS) is a mechanism whereby all minimum use and infrastructure requirements identified within the policy can be found a “home” (location), and delivered in full whilst recognising existing Green infrastructure and the options for enhancement.</p> <p>1.79 Within a number of responses that have been received it is noted that concerns regarding the implication of CDSs have been raised – most particularly the perception that these would otherwise require agreement between two or more land owners or developers. The CDS</p>	<p>Q73 – Purpose of Comprehensive development scheme</p>

has the benefit of ensuring that all uses, infrastructure and requirements are addressed and that none are left to the last developer to bring forward.

1.80 The Policy requirement for the CDS does not set that there is a need for agreement between developers and as result it is possible for a developer to submit a CDS for the allocation without regard to other land owners. If this occurred then the Council would be able to consult with other relevant land owners and take a view on whether the plan demonstrates a suitable distribution. However it is also important to note that three of the expansion areas are, in a large part under the control of a single developer/owner - only Grange does not enjoy such a majority owner.

1.81 To ease the requirement where there is a majority land owner it would be possible to build into the policy a threshold which effectively allows developers, where they hold a significant controlling majority, to entirely manage their own CDS. If this threshold was set at 80% it would facilitate the delivery at Bluehayes, Treasebeare and Cobdens where the majority control all lie above this percentage. For such areas it is nonetheless less still appropriate to retain a requirement for a CDS, as land ownership and control can change or become fragmented over time.

1.82 If this modification is made to Policy it would have to recognise that where there is a large majority control, there is an expectation for the majority developer to be responsible for delivering all infrastructure that is already identified on their land through the masterplan (linked by Policy CB16), as well as all the remaining non-geographically identified infrastructure set out within the allocations policy.

<p>1.83 Additional Question: Are any Main Modifications proposed in relation to Issue 8?</p>	<p>AQ8 – Main modifications</p>
<p>1.84 1. Policy CB3 (last paragraph) amended to read:</p> <p>Residential development proposals on non-allocated sites within the Cranbrook Plan Area Built-up Area Boundary must make a the proportionate (per dwelling) financial contribution set out within the up to date Cranbrook Infrastructure Delivery Plan towards infrastructure which is to-outstanding either unfunded or not fully funded infrastructure.</p> <p>2. CB3 second paragraph to read:</p> <p>Unless there is sole control of at least 80% of the allocation area by a lead developer/land owner, a A comprehensive Development Scheme addressing the Cobdens expansion area in its entirety and recognising and where possible enhancing existing biodiversity assets and green infrastructure shall set out provision for all of the following uses, requirements and infrastructure.</p> <p>For allocations where there is such a lead developer, the Comprehensive Development Scheme need only address the land holding under the control of the lead developer, but as a result is expected to identify and deliver all uses, requirements and infrastructure listed below except where these are, either in part or in full, specifically located elsewhere within the Masterplan set out for this allocation shown (collectively at Figure 8).</p>	

<p>The scheme shall be agreed in writing by the Local Planning Authority before any planning application for development in the CDS area of all or part of the expansion area is determined. Subsequent applications must comply with the approved comprehensive development scheme. Where land is allocated for specific uses on the policies map, the uses will fall on and within the designated areas:</p>	
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Appendices

There are no appendices for this statement